



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

Dr. Patrick J. Rogan
Chief Veterinary Officer
Department of Agriculture and Food
and Rural Development (DAFRD)
Kildare Street
Dublin 2, Ireland

OCT 05 2007

Dear Dr. Rogan:

The Food Safety and Inspection Service (FSIS) conducted an on-site audit of Ireland's meat inspection system June 1 to June 13, 2007. Comments from Ireland have been included in the final audit report. Enclosed is a copy of the final audit report.

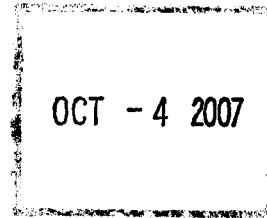
If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (402) 344-5100, by facsimile at (402) 344-5169, or electronic mail at donald.smart@fsis.usda.gov.

Sincerely,

Donald Smart
Director
International Audit Staff
Office of International Affairs

Enclosure

FINAL



**FINAL REPORT OF AN AUDIT CARRIED OUT IN THE
REPUBLIC OF IRELAND COVERING THE REPUBLIC OF
IRELAND'S MEAT PRODUCTS INSPECTION SYSTEM**

JUNE 1 through JUNE 13, 2007

**Food Safety and Inspection Service
United States Department of Agriculture**

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority, the Department of Agriculture and Food (DAF)
CCP	Critical Control Point
CVO	Chief Veterinary Officer
DAF	Department of Agriculture and Food
DCVO	Deputy Chief Veterinary Officer
DVO	District Veterinary Officer
EC	European Commission
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
<i>Lm</i>	<i>Listeria monocytogenes</i>
NOID	Notice of Intent to Delist
OV	Official Veterinarian
PHIS	Public Health Inspection Service
RSVI	Regional Superintending Veterinary Inspector
RVO	Regional Veterinary Officer
<i>Salmonella</i>	<i>Salmonella</i> species
SPS	Sanitation Performance Standards
SSOP	Sanitation Standard Operating Procedure(s)
SVI	Superintending Veterinary Inspector
TAO	Technical Agricultural Officer

TVI	Temporary Veterinary Inspector
VEA	European Community/United States Veterinary Equivalence Agreement
VI	Veterinary Inspector

1. INTRODUCTION

The audit took place in Ireland from June 1 through June 13, 2007.

An opening meeting was held on June 1, 2007 in Dublin with the Central Competent Authority (CCA). At this meeting, the auditor confirmed the objective and scope of the audit, the auditor's itinerary, and requested additional information needed to complete the audit of Ireland's meat inspection system.

The auditor was accompanied during the entire audit by representatives from the CCA, the Department of Agriculture and Food (DAF) and, when appropriate, by representatives from the regional and local inspection/establishment offices.

2. OBJECTIVE OF THE AUDIT

This was a routine annual audit. The objective of the audit was to evaluate the performance of the CCA with respect to controls over the slaughter and processing establishments certified by the CCA as eligible to export meat products to the United States.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, one regional inspection office, one local inspection office, and one slaughter and cutting establishment.

Competent Authority Visits			Comments
Competent Authority	Central	1	Central office of DAF in Dublin
	Divisional	1	DVO regional office in Cork (South Region).
	Local	1	Establishment level
Laboratories		3	One private microbiology laboratory and two government residue laboratories
Meat Slaughter and Cutting Establishments		1	Waterford
Processing Establishments		0	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved an audit of a selection of records in the country's inspection headquarters, regional and local government offices. The third involved an on-site visit

to one swine slaughter and cutting establishment. The fourth part involved visits to two government residue laboratory and one private microbiology laboratory.

Program effectiveness determinations of Ireland's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP), (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP programs, (4) residue controls, and (5) enforcement controls. Ireland's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent and degree to which findings impacted on food safety and public health. The auditor also assessed how inspection services are carried out by Ireland and determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.

During the opening meeting, the auditor explained to the CCA that their inspection system would be audited in accordance with three areas of focus. First, under provisions of the European Community/United States Veterinary Equivalence Agreement (VEA), the FSIS auditor would audit the meat inspection system against European Commission Directive 64/433/EEC of June 1964; European Commission Directive 96/22/EC of April 1996; and European Commission Directive 96/23/EC of April 1996. These directives have been declared equivalent under the VEA.

Second, in areas not covered by these directives, the auditor would audit against FSIS requirements. These include daily inspection in all certified establishments, humane handling and slaughter of animals, the handling and disposal of inedible and condemned materials, species verification, and FSIS's requirements for HACCP, SSOP, and testing for generic *E. coli*/*Enterobacteriaceae* and *Salmonella* species.

Third, the auditor would audit against any equivalence determinations that have been made by FSIS for Ireland under provisions of the Sanitary/Phytosanitary Agreement.

- FSIS has determined that the use of *Enterobacteriaceae* and Total Viable Count in lieu of testing for generic *E. coli* is acceptable for all EU exporting countries.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to End), which include the Pathogen Reduction/HACCP regulations.

In addition, compliance with the following European Community Directives was also assessed:

- Council Directive 64/433/EEC, of June 1964, entitled “Health Problems Affecting Intra-Community Trade in Fresh Meat”
- Council Directive 96/23/EC, of 29 April 1996, entitled “Measures to Monitor Certain Substances and Residues Thereof in Live Animals and Animal Products”
- Council Directive 96/22/EC, of 29 April 1996, entitled “Prohibition on the Use in Stockfarming of Certain Substances Having a Hormonal or Thyrostatic Action and of β -agonists”

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS’ website at the following address:
http://www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp

The following deficiencies were identified during the FSIS audit of Ireland’s meat inspection system conducted in 2004:

- In one establishment, DAF meat inspection officials usually did not verify any corrective actions taken by the establishment, including preventive measures for the identified deficiencies for pre-operational sanitation.
- One establishment did not follow some of the following procedures in its written HACCP plan for CCP2:
 - Temperature readings are to be taken from two carcasses (each carcass at three locations).
 - Records are to include the times and signatures or initials of the establishment employee performing the monitoring activity.
- In one establishment, EU Directive 64/433 was not adequately enforced: The DAF meat inspectors were not palpating the mesenteric lymph nodes of swine viscera.
- The following information was missing in the official standards book:
 - The source of the standard solutions/reagent/media ingredient were purchased
 - Lot numbers and expiration dates for trace elements
 - Comprehensive documentation of the preparation of standard solutions for trace elements (chemical inventory number, amount used, expiration dates, and initials)
- On March 16, 2004, the Laboratory Quality Assurance Manager (LQAM) audited the Pesticide Control Service Laboratory and found that quality system needed to be updated to define a procedure for the installation of a new column.

On April 27, on a follow-up audit, the LQAM found that previously issued CARs had not been resolved; therefore, he extended the deadline for correction by three days. On June 6, 2004 during this FSIS audit, it was found that the deficiency still existed.

During the most recent audit of Ireland, conducted by FSIS in 2005, the following deficiencies were identified:

- In all three establishments, some of the requirements for SSOP were not implemented.
- One establishment was shipping swab samples for *Salmonella* analysis to a private laboratory in Wexford, which was not approved to handle U.S.-eligible samples.

6. MAIN FINDINGS

6.1 Legislation

The auditor was informed that the relevant EC Directives, determined equivalent under the VEA, had been transposed into Ireland's legislation.

6.2 Government Oversight

6.2.1 CCA Control Systems

The Central Competent Authority (CCA), the Department of Agriculture and Food (DAF), is responsible for direct oversight of Ireland's export meat inspection system, farm animal health and welfare, and for safety of foods of animal origin, including the control of residues. The primary responsibility is vested with the Minister of Agriculture and Food. The State Veterinary Services (SVS) of the DAF advise the Minister on matters of animal health and disease, zoonoses, and public health as they relate to food and products of animal origin.

The Chief Veterinary Officer (CVO) and a management team of Senior Veterinary Officers are based in the HQ office in Dublin. Each of six Regional Public Health Inspectorate Regions (Northeast, Northwest, Southeast, Southwest, East, and South) is each under the supervision of a Regional Superintending Veterinary Inspector (RSVI). Slaughterhouses and meat processing establishments are supervised by Veterinary Inspectors (VIs) at *Veterinary Offices at Meat Establishments*. They are employees of the Veterinary Public Health Inspection Service (VPHIS) of the DAF. VIs are permanently located in all larger meat slaughtering and processing establishments and are responsible for ante- and post-mortem inspection, SSOP and HACCP programs, structural and operational hygiene standards, and controls for animal welfare, animal identification and residues.

6.2.2. Ultimate Control and Supervision

The VHPIS is overseen by the Chief Veterinary Officer (CVO) and operates under the supervision of a Deputy Chief Veterinary Officer (DCVO), two Senior Superintending Veterinary Inspectors (SSVI) and five Superintending Veterinary Inspectors (SVIs) based in headquarters, and six regionally-based SVIs who oversee the implementation of veterinary controls in the meat establishments in their areas and report directly to headquarters. The 90 Veterinary Inspectors (VIs) are assisted by 309 Technical Agricultural Officers (TAO) and 705 part-time Temporary Veterinary Inspectors (TVIs).

6.2.3 Assignment of Competent, Qualified Inspectors

The auditor observed that competent, qualified inspection personnel were assigned to the establishment eligible to export to the United States. All inspection personnel working in Ireland's establishments must be fully qualified in accordance with legislative and instructional requirements meaning that they undergo induction training as well as participate in on-job practical training under the supervision of experienced veterinarians.

Veterinarians must have veterinary degrees. Some have veterinary degrees from other European Universities (e.g., in Italy and Spain). The Technical Agricultural Officers have received their (college degree) diplomas from the Agricultural College after accomplishing one year of study.

A mentoring program is in place for VIs. On being recruited, they commence on-the-job training under the supervision of an experienced VI. The recruit visits a variety of slaughter, cutting and processing plants in the meat sector as necessary. Before being engaged, TVIs must undergo a period of on-the-job practical training under the supervision of full-time Veterinary Inspectors. There is also ongoing supervision and on-the-job-training by the VI of the TVI. Technical Agricultural Officers engaged to assist the official veterinarian at meat establishments (on duties other than ante- and post-mortem inspections) are required to have a third level qualification in agriculture-related studies at the National Certificate level or equivalent.

On recruitment, the appointed officer undertakes induction courses involving classroom and on-the-job training. On-the-job training continues under the supervision of the Veterinary Inspector and supervisory regional and Headquarters Agricultural Officers. The training is delivered in modular form to all TAOs over a period of five years and involves classroom and laboratory courses on hygiene, microbiology and HACCP programs. The training continues with a module comprising 24 hours of theoretical study and 24 hours of practical demonstrations on aspects of animal welfare, livestock production, disease control, animal identification, ante-mortem inspection, and slaughtering techniques and procedures. A written and practical examination is held at the end of each module before certification is provided.

6.2.4 Authority and Responsibility to Enforce the Laws

Veterinary Inspectors and TAOs are authorized to enforce EU legislation and U.S. import requirements including animal health and welfare, control of animal disease, veterinary medicines, and production of safe foods of animal origin. Through legal process in the courts, DAF has the authority to suspend and delist certified establishments to prevent the export of unsafe meat to the United States.

The FSIS requirements are distributed by e-mail or hard copy from DAF headquarters to the regionally-based SVI and VIs. All FSIS requirements are on an internet site and are readily available to Ireland's inspection force.

Veterinary inspectors have been given the necessary authority, under national legislation, to take appropriate enforcement actions in the case of non-compliance or breaches of the regulations.

Non-compliances are categorized according to the risk to the consumer:

- Major non-compliances are those which constitute serious and immediate threats to public health. In these cases, the VI may suspend production or prohibit the use of all or part of the establishment or equipment until the risk has been eliminated.
- Minor (Category 2) non-compliances are deficiencies deemed to pose potential threats to public health. In these cases, the VI serves a notice requiring the owner or person in charge of the establishment to correct the deficiencies within a specific time scale.
- Minor (Category 3) non-compliances do not pose threats to public health.

Criminal prosecution is specified in Legislation.

The VI can suspend a U.S.-certified establishment for non-compliance. Delistments are done at headquarters in consultation with the CVO, the DCVO, and the SSVI.

6.2.5 Adequate Administrative and Technical Support

During the audit, the auditor found that the CCA had administrative and technical support to operate Ireland's inspection system and had the resources and ability to support a third-party audit.

6.2 Headquarters Audit

The auditor conducted a review of inspection system documents at the headquarters, regional, local, and in-plant inspection offices. The records review focused primarily on food safety hazards and included the following:

- Methods of payment for inspection personnel

- Proper distribution of relevant legislation to inspection personnel
- The process of hiring, qualification and assignment of inspection personnel to the U.S.-certified establishments
- Internal review reports
- Supervisory visits to establishments that were certified to export to the U.S.,
- Training records for inspectors and laboratory personnel
- Animal disease status
- Supervisory visits to U.S. certified establishments
- New laws and implementation documents such as regulations, notices, directives and guidelines
- Official communications with field personnel, both in-plant and supervisory, in U.S. certified establishments
- Sampling and laboratory analyses for residues
- Sanitation, and slaughter inspection procedures and standards
- Enforcement actions

No concerns arose as a result of the examination of these documents.

6.2.1 Audits of Divisional and Local Inspection Sites

Divisional Office

The South Divisional Veterinary Office was reviewed in Cork. The purpose of the assessment was to review the meat inspection records and determine the level of government oversight and control provided by the divisional offices relative to the certified establishments.

No deficiencies were noted.

Local Inspection Site at the Certified Establishment

The purpose of the assessment was to review the meat inspection records and determine the level of government oversight and control provided by the local inspection office relative to the certified establishments.

No deficiencies were noted.

7. ESTABLISHMENT AUDITS

The FSIS auditor visited one swine slaughter and cutting establishment that was currently certified as eligible to export to the U.S. The establishment was not delisted and did not receive a Notice of Intent to Delist (NOID) from Irish inspection officials.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis is placed on the application of procedures and standards that are equivalent to United States requirements.

Residue laboratory audits focus on sample handling, sampling frequency, timely analysis, data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, and intra-laboratory check sample and quality assurance programs, including standards books and corrective actions.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check sample programs.

Two government-owned and operated residue laboratories and one private microbiology laboratory were audited:

- The DAF Central Meat Laboratory is located outside of Dublin and conducts analyses of field samples for Ireland's national residue program.
- The DAF Pesticide Control Laboratory is a government laboratory located outside of Dublin, which conducts analyses of field samples for Ireland's national residue program. This laboratory has received ISO Standard 17025 accreditation.
- Microchem Laboratories is a private laboratory, located in Dungarvan, which conducts analyses of field samples for the presence of *Salmonella* species and generic *E. coli*. This laboratory has received ISO Standard 17025 accreditation.

No deficiencies were observed.

9. SANITATION CONTROLS

As stated earlier, FSIS auditors focus on five areas of risk to assess an exporting country's meat inspection system. The first of these risk areas that the FSIS auditor reviewed was Sanitation Controls.

Based on the on-site audits of the establishment, and except as noted below, Ireland's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene practices, and good product handling and storage practices.

In addition, except as noted below, Ireland's inspection system had controls in place for light, back-siphonage prevention, temperature control, ante-mortem facilities, ventilation,

plumbing and sewage, water supply, dressing rooms/lavatories, welfare facilities, outside premises and condemned product control.

No deficiencies were identified concerning these elements at the establishment audited.

9.1 SSOP

One establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the U.S. domestic inspection program. The SSOP in the establishment were found to meet the basic FSIS regulatory requirements, with the following deficiencies:

- Pieces of fat, meat scraps and grease were observed on several meat-contact areas (a conveyor belt, a cutting board and a knife holder) in the cutting room during pre-operational sanitation inspection.
- Several deep cuts were observed in the conveyor belt for edible product in the meat cutting room during operational sanitation inspection.

9.2 SANITATION PERFORMANCE STANDARDS

No deficiencies were noted.

9.3 EC Directive 64/433

No deficiencies were noted.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditor reviewed was Animal Disease Controls. These include ensuring adequate animal identification, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditor determined that Ireland's inspection system had adequate controls in place. No deficiencies were noted.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditor reviewed was Slaughter/Processing Controls. The controls include ante-mortem inspection procedures; ante-mortem dispositions; humane handling and humane slaughter; post-mortem inspection procedures and dispositions; ingredients identification; control of restricted ingredients, formulations,

processing schedules, equipment, and records; and processing controls of cured, dried, and cooked products.

The controls also include the implementation of HACCP systems in all establishments and implementation of a testing program for generic *E. coli* in slaughter establishments.

11.1 Humane Handling and Humane Slaughter

No deficiencies were identified regarding humane handling or humane slaughter.

11.2 HACCP Implementation

No deficiencies were identified regarding HACCP implementation.

11.3 Testing for Generic *E. coli*

FSIS has determined that the use of *Enterobacteriaceae* and Total Viable Count in lieu of testing for generic *E. coli* is acceptable for all EU exporting countries. However, Ireland continues to use generic *E. coli* testing for product exported to the U.S.

11.4 Testing for *Listeria monocytogenes*

The establishment was not producing ready-to-eat products for export to the United States and was not required to meet the FSIS requirements for *Listeria monocytogenes* testing. Ireland currently exports only raw pork to the US.

11.5 EC Directive 64/433

The provisions of EC Directive 64/433 were effectively implemented in the establishment.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditor reviewed was Residue Controls. These controls include sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions.

No deficiencies were noted.

Ireland's National Residue Control program for 2007 was being followed and was on schedule.

12.1 EC Directive 96/22

In the DAF Central Meat Laboratory and the DAF Pesticide Control Laboratory, both located outside of Dublin, the provisions of EC Directive 96/22 were effectively implemented.

12.2 EC Directive 96/23

In the DAF Central Meat Laboratory and the DAF Pesticide Control Laboratory, both located outside of Dublin, the provisions of EC Directive 96/23 were effectively implemented.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditor reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella*.

No deficiencies were noted.

13.1 Daily Inspection in Establishments

Inspection was being conducted daily in the audited establishment and was well-documented.

13.2 Testing for *Salmonella*

Ireland has adopted the FSIS regulatory requirements for testing for *Salmonella*.

The establishment audited was required to meet the basic FSIS regulatory requirements for *Salmonella* testing and was evaluated according to the criteria employed in the United States' domestic inspection program.

No deficiencies were identified regarding the testing programs for *Salmonella*.

13.3 Species Verification

Species verification was being conducted in the audited establishment as required.

13.4 Periodic Reviews

Periodic supervisory reviews of the certified establishment were being performed and documented as required at the time of the audit.

13.5 Inspection System Controls

The CCA had controls in place for ante-mortem and post-mortem inspection procedures and dispositions; restricted product and inspection samples; disposition of dead, dying, disease or disabled animals; shipment security, including shipment between establishments to prevent commingling of product intended for export to the U.S. with product intended for the domestic market.

In addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other countries for further processing.

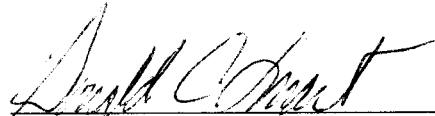
Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on June 13, 2007 in Dublin with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditor.

The CCA understood and accepted the findings.

for Oto Urban, DVM
Senior Program Auditor



15. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Form
Foreign Country Response to Draft Final Audit Report

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Queally Pig Slaughtering Limited, Dawn Pork and Bacon, Grannagh, Waterford, Ireland	2. AUDIT DATE 6 - 6 - 2007	3. ESTABLISHMENT NO. 332	4. NAME OF COUNTRY Republic of Ireland
	5. NAME OF AUDITOR(S) Oto Urban, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X	36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Est. 332, 6-6-07, Dawn Pork and Bacon, slaughter/processing, Grannagh, Waterford, Republic of Ireland

10 Pieces of fat, meat scraps and grease were observed on several meat contact areas (a conveyor belt, a cutting board and a knife holder) in the cutting room during pre-operational sanitation inspection. Corrective action was taken both by the inspection service officials and by establishment personnel. [Regulatory reference: 9CFR 416.13(c)]

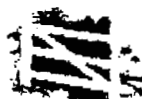
10/51 Several deep cuts were observed in the conveyor belt for edible product in the meat cutting room during operational sanitation inspection. The inspection service officials ordered that the belt must be replaced. [9CFR 416.13(c)]

61. NAME OF AUDITOR

Oto Urban. DVM

62. AUDITOR SIGNATURE AND DATE

Oto Urban 7/18/07



THE DEPARTMENT OF
AGRICULTURE & FOOD
AN ROINN TALMHAÍOCHTA AGUS BIA

**Mr Donald Smart
Director
International Audit staff
Office of International Affairs
Food Safety Inspection Service (FSIS)
United States Department of Agriculture
Washington DC 20250
United states**

29th August 2007

Dear Mr Smart

Thank you for your letter of 23rd July 2007 referring to the FSIS on-site audit of Ireland's meat and poultry inspection system carried out between 1st June and 13th July 2007. The findings of the draft final audit report are accurate and fair and we have therefore no specific comments at this time.

Please convey our thanks to Dr Urban for the thorough and professional manner in which he conducted the audit.

Kind regards.

Yours sincerely,

P J Rogan
Chief Veterinary Officer